IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR MARION COUNTY

ADAM EUGENE KOBS, an individual, and **N.K.,** a minor, by and through his father and natural guardian, ADAM E. KOBS**,** *Plaintiffs,* v. **SILVERTON SHELTERING SERVICES** d.b.a. **"SHELTERING SILVERTON,"** an Oregon public-benefit nonprofit corporation; **SARAH WHITE**, individually; **JOSEPH SCHMAUS**, individually; **JORDAN SIMS**, individually; and **TRAVIS DEAN GLIDDEN**, individually, *Defendants,*	Case No. 25CV57849 PLAINTIFF'S MOTION FOR LEAVE TO FILE SUPPLEMENTAL DECLARATION IN SUPPORT OF MOTION FOR SANCTIONS ORCP 23

Plaintiff Adam E. Kobs, pro se, moves this Court under ORCP 23 for leave to file the attached Supplemental Declaration and **Exhibit A** (manufacturer documentation from Anker Innovations Ltd. regarding Eufy retention capability) for the limited purpose of adjudicating Plaintiff's pending Motion for Sanctions. Good cause exists because the Exhibit was discovered after Plaintiff filed his Reply and directly contradicts sworn testimony in the record.
Grounds and supporting facts:

1. **Procedural posture**. Plaintiff filed a Motion for Sanctions on December 30, 2025 and a Reply in support on January 15, 2026. Subsequent to that Reply, Plaintiff located public manufacturer documentation from Anker Innovations Ltd. (the maker of the "Eufy"

product line) indicating that for business systems a 30-day retention baseline is common. That documentation is attached as **Exhibit A** to the Supplemental Declaration.

2. **Contradiction of sworn testimony**. Defendant Sarah White has sworn under penalty of perjury (Dec. 17, 2025 Decl.; Dec. 23, 2025 Am. Decl.) that "Sheltering Silverton uses a Eufy camera system which does not retain videos for more than a few days" and that "All of the footage that plaintiff has requested in relation to this matter was automatically deleted before plaintiff filed this suit and cannot be recovered." Those statements are directly contradicted by the manufacturer guidance attached as **Exhibit A** and by Plaintiff's eyewitness observations. The quoted sworn statements (above) are central to Defendants' objections to the Preservation Order and to the Motion to Dissolve that Order.

3. **Eyewitness, forensic facts supporting a cloud-based inference**. Plaintiff's Supplemental Declaration (filed concurrently) recounts specific, personal observations that shelter staff used the Eufy mobile application on company cell phones to view recordings from prior days on multiple occasions, and that Plaintiff did not observe any on-site DVR/NVR hardware or server equipment in the shelter's office or mechanical room. These in-person observations, combined with **Exhibit A**, make a reasonable forensic inference that the shelter either (a) used a cloud-based Eufy subscription or (b) had remote app access to multi-day recordings — either configuration would permit at least 30 days retention capability as described by the manufacturer. In addition, to comply with the Court's Preservation Order and her preservation obligations, Ms. White had readily available steps at her disposal, including (i) contacting Anker/Eufy support to increase or extend the account's retention settings to at least the 30-day baseline referenced in **Exhibit A** and (ii) inquiring with Anker/Eufy regarding potential recovery of "deleted" video from at least August 2024 (as cloud-based systems sometimes allow recovery or restoration from server-side backups or archives). Ms. White's declarations identify none of these reasonable steps, despite their availability to her.

4. **Preservation duty and urgency**. Plaintiff issued a Tort Claim Notice that was received by Sheltering Silverton on October 6, 2025 (ORS 30.275), which put the shelter on notice of a reasonable expectation of litigation. The Court signed a Preservation Order on

December 5, 2025 requiring technical detail and suspension of deletions. The newly discovered **Exhibit A** creates a substantial and immediate issue as to whether the shelter had the ability and duty to preserve footage (including August 2024 footage) and whether reasonable steps were taken to preserve or recover deleted material. Because preservation is time-sensitive, presenting the Exhibit to the Court without delay is necessary.

5. **Safe-harbor and relief requested**. Plaintiff respectfully requests the Court to grant leave to file the supplemental **declaration** and **Exhibit A** for the limited purpose of the pending sanctions motion; to declare that service of the supplement **restarts or tolls the 21-day safe-harbor under ORCP 17** for any sanctions arising from the facts challenged by Plaintiff; and to set an expedited schedule for responsive briefing (Defendants' response within 7 days; Plaintiff's reply within 3 days) or an expedited show-cause hearing. Plaintiff further asks the Court to compel Defendants to file the Technical Declaration required by the Court's Preservation Order within seven (7) days that includes camera models, storage architecture (cloud vs. local), subscription details and invoices, retention settings, export logs, user/access logs, and any deletion activity affecting footage from January 1, 2024 to present, including August 2024.

WHEREFORE, for the reasons above, Plaintiff respectfully requests the Court grant leave to file the attached Supplemental Declaration and **Exhibit A** for the limited purpose of adjudicating Plaintiff's pending Motion for Sanctions, toll/restart the ORCP 17 safe-harbor as described, and set an expedited briefing schedule.

Dated: January 16th, 2026

/s/ Adam Kobs

Adam E. Kobs, Pro Se
Residential address is confidential
Confidential Information Form (CIF) filed under UTCR 2.130
Email: adamkobs1984@proton.me

Exhibit A

Eufy Website Screenshot Showing Standard 30-day Business System Setups and Cloud-Based Subscription Plans Offering 30-day Access to All Tiers of Plan

There's Nothing More Secure Than ExpertSecure

How Long Do Security Cameras Keep Footage? Average Storage

Updated Dec 15, 2025 by eufy team

| 7 min read

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Thinking about setting up a security camera system to keep an eye on your property? A common question pops up right away: *"How long do security cameras keep footage?"* The truth is, it depends. Some setups only hang on to recordings for a few days, while others can store weeks or even months of video.

Knowing what to expect helps you avoid losing important evidence and gives you control over how your system works. This guide breaks down the average retention times, what affects them, and simple ways to make your security videos last longer.

How Long Do Security Cameras Keep Footage on Average?

Security cameras don't hold onto video forever. Instead, they work in a **rolling loop**: once storage fills, the oldest clips get erased to make room for new ones. How long that loop lasts depends on how the system is set up and where the footage is stored.

For a quick answer to "How long do most security cameras keep footage?" most home setups keep recordings for **about 7 to 30 days**. Business systems often aim for **30 days** as a baseline, with some stretching to **six months or more**

Now let's break that down further:

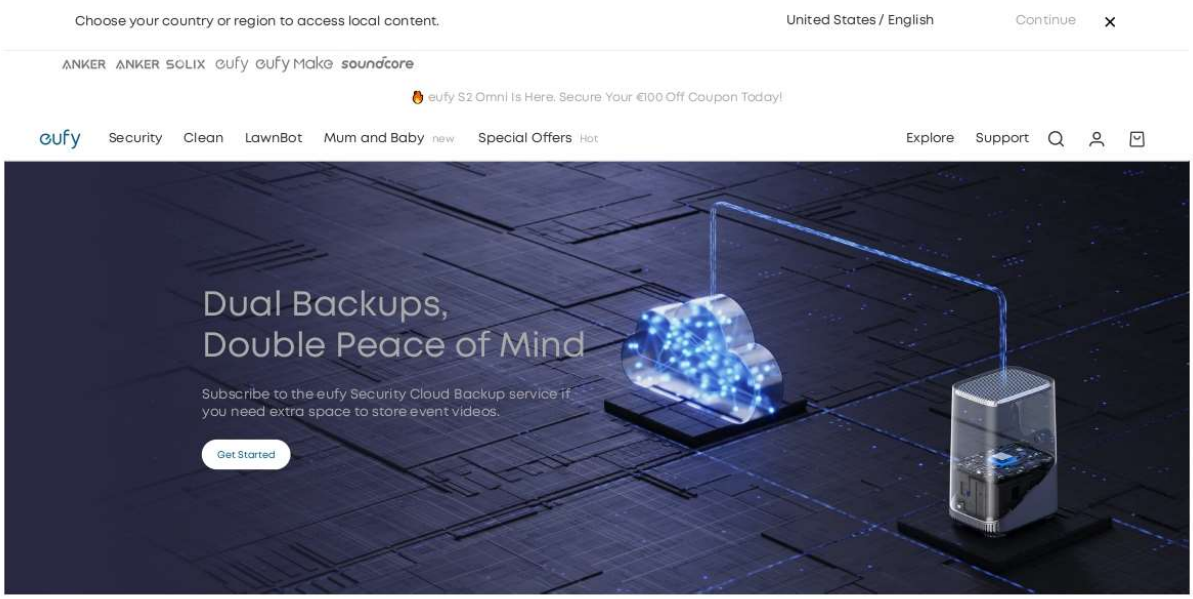
- **Cloud storage(home use):** Free plans often save only a **few hours to a few days** of clips. Paid subscriptions usually extend this to **two weeks (14 days), a month (30 days), or sometimes two months (60 days)**. If continuous recording is offered, it tends to cover a shorter span, often about a week (7-10 days), because it eats up more space.
- **Local storage on an SD card (single camera):** A small card might only hold **a couple of days**of recordings at standard settings. Larger cards can stretch that to **a week or two**, and sometimes longer if you record only on motion. The camera automatically overwrites the oldest files once the card is full.
- **Local DVR or NVR with a hard drive (multi-camera):**A modest system with a **1–2 TB drive** often stores **one to six weeks** of continuous video, depending on the number of cameras and their settings. Larger drives, 4 TB or more, can keep **several months** if you use motion-triggered recording instead of 24/7 capture.
- **Workplaces and institutions:**Many organizations standardize on **about 30 days** of retention. Some stretch this to **60, 90, or even 180 days** if regulations or security policies require it, but that usually means investing in bigger drives or higher-tier cloud plans.

Factors Affecting Security Camera Storage Capacity

You see, when we ask, "How long do home security cameras keep footage?" two setups with identical hard drives can hold very different amounts of video.

Why? Because storage depends on more than just drive size. The way your cameras record, compress, and manage video plays a huge role in how long the footage lasts before it gets overwritten.

Let's take a closer look:


Choose your country or region to access local content.
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ANKER ANKER SOLIX eufy eufy Make soundcore
eufy S2 Omni Is Here. Secure Your €100 Off Coupon Today!
eufy Security Clean LawnBot Mum and Baby new Special Offers Hot
Explore Support
Dual Backups,
Double Peace of Mind
Subscribe to the eufy Security Cloud Backup service if you need extra space to store event videos.
Get Started

An Extra Approach to Storage

30 DAY

Longer Video History
Overwrite Protection

Still Accessible
Even if Devices are Offline

AWS Advanced
Encryption

Choose A Plan

Basic Plan	Basic Plan	Plus Plan	Plus Plan
			Recommended
• Covers 1 device • Stores videos for every 30 days	• Covers 1 device • Stores videos for every 30 days	• Cover all devices • Stores videos for every 30 days	• Cover all devices • Stores videos for every 30 days
To cover multiple devices, please select a service package that includes multi-device support. Repeatedly purchasing the same package will extend service only for the original device, not for additional ones.	To cover multiple devices, please select a service package that includes multi-device support. Repeatedly purchasing the same package will extend service only for the original device, not for additional ones.	To cover multiple devices, please select a service package that includes multi-device support. Repeatedly purchasing the same package will extend service only for the original device, not for additional ones.	To cover multiple devices, please select a service package that includes multi-device support. Repeatedly purchasing the same package will extend service only for the original device, not for additional ones.
Sold Out	Sold Out	Sold Out	Sold Out
Sold Out Learn More	Sold Out Learn More	Sold Out Learn More	Sold Out Learn More

SUPPLEMENTAL DECLARATION OF ADAM E. KOBS

I, Adam E. Kobs, declare under penalty of perjury as follows:

1. I am the Plaintiff in the above-captioned matter and have personal knowledge of the facts stated herein.
2. I make this declaration in support of Plaintiff's Motion for Leave to File Supplemental Declaration and in support of Plaintiff's pending Motion for Sanctions.
3. After filing Plaintiff's Reply in support of the Motion for Sanctions (filed Jan. 15, 2026), I located public manufacturer documentation published by Anker Innovations Ltd., the manufacturer of the Eufy product line, discussing retention capabilities for Eufy systems. A true and correct PDF printout of the relevant portion of that webpage is attached as **Exhibit A.** The page states: "For business security systems, 30 days is often a baseline to aim for..." (emphasis added).
4. During the period relevant to this litigation (October 2023 through September 2024 and in subsequent visits), I personally observed multiple shelter staff members using company-issued cell phones to open the Eufy Security mobile application and to view recorded footage from prior days. On those occasions staff scrolled back through a timeline and selected prior recordings for review. Those viewings were app-based replays (paid subscription), not simply a live camera feed (free version). These observations occurred on multiple dates.
5. I recall seeing accessible facility areas (back office, storage closet, and other equipment spaces) and did not observe any local network video recorder (NVR), DVR, or server rack that would constitute on-site hardware for long-term local retention. The cameras and app usage I observed are consistent with a consumer/cloud-centric Eufy configuration, rather than an on-site DVR architecture visible in the premises. The cameras themselves were battery-powered, not hardwired, and default settings for them may have been motion-activated captures, not continuous video for battery preservation.
6. Defendant Sarah White has filed sworn declarations dated December 17, 2025 and December 23, 2025 stating, in substance:

"Sheltering Silverton uses an Eufy camera system which does not retain videos for more than a few days." Additionally, "All of the footage that plaintiff has requested in relation to this matter was automatically deleted before plaintiff filed this suit and cannot be recovered."

These sworn statements are inconsistent with the manufacturer guidance attached as **Exhibit A** and with my firsthand observations of staff accessing prior recordings using the Eufy app.

7. Once the Tort Claim Notice was received by Sheltering Silverton on October 6, 2025 (ORS 30.275), the shelter had a duty to take reasonable steps to preserve relevant ESI, including CCTV footage. Reasonable steps include: suspending automatic deletion; exporting and preserving native video files for relevant date ranges; documenting and preserving account access and export logs; preserving devices used to access the app; contacting Anker/Eufy technical support to increase retention settings or request assistance in recovering deleted footage; and producing subscription invoices and account records showing plan retention features.
8. To my knowledge, no such remediation or request for technical assistance to Anker/Eufy was performed or documented prior to Plaintiff's filing of this action. Defendant White's sworn declarations do not assert that she contacted Anker/Eufy for assistance in preserving or recovering footage, nor do they identify any efforts to export or preserve the August 2024 footage after notice.
9. The Eufy manufacturer guidance in **Exhibit A** together with my eyewitness observations support a reasonable inference that the shelter had the capability to retain at least 30 days of recordings under commonly available business / cloud subscription configurations. Accordingly, the sworn statements that only "a few days" existed and that footage "cannot be recovered" are materially inconsistent with the evidence now presented to the Court.
10. The CCTV footage is the *sine qua non* of Plaintiff's ability to establish the chronology, content, and context of events alleged (threats, arson threats, readmissions, staff reactions, and preservation failures). If footage from August 2024 was available and not preserved after notice, the prejudice to Plaintiff is severe.

11. I declare under penalty of perjury under the laws of the State of Oregon that the foregoing is true and correct.

Date: January 16th, 2026

_____/s/ Adam Kobs_____

Adam E. Kobs, Pro Se
Residential address is confidential
Confidential Information Form (CIF) filed under UTCR 2.130
Email: adamkobs1984@proton.me

CERTIFICATE OF COMPLIANCE WITH UTCR 5.010 — GOOD CAUSE FOR NOT PREFILING A CONFERRAL COMMUNICATION

I, Adam E. Kobs, certify under UTCR 5.010 as follows:

1. On January 16th, 2026 Plaintiff discovered publicly available manufacturer documentation on the Anker Innovations Ltd. (Eufy) website that directly contradicts Defendant Sarah White's sworn statements regarding the retention capabilities of the shelter's Eufy system. The documentation in **Exhibit A** (attached to the Supplemental Declaration) includes the statement: "For business security systems, 30 days is often a baseline to aim for..." and was printed and saved by Plaintiff on January 16th, 2026.
2. Plaintiff filed his Reply in support of the Sanctions Motion on January 15, 2026. The Exhibit A documentation was discovered thereafter. Pre-filing conferral was impracticable and posed a risk of prejudice for two independent reasons: First, the evidence directly impeaches the credibility of Defendant White's sworn statements to this Court. Conferring with an opposing party about evidence that demonstrates their client has provided false testimony does not serve the purpose of UTCR 5.010 and could have prompted further obstructive conduct. Second, the evidence pertains to the configuration and preservation status of the very ESI at issue. Immediate filing was necessary to promptly place the objective manufacturer specifications before the Court and to support the requested preservation protocols without affording the opposing party an opportunity to alter the evidence or their account.
3. Immediately upon filing the attached Motion for Leave to File Supplemental Declaration, Plaintiff served defense counsel by email (to: gkeating@schulte-law.com; thonn@schulte-law.com; rmurphy@schulte-law.com; msmith@schulte-law.com) a copy of the filed motion, the Supplemental Declaration, and Exhibit A, and offered counsel forty-eight (48) hours from the time of that email to notify Plaintiff in writing whether Defendants will stipulate to the limited relief requested (admission of the supplement for the sanctions motion and restarting/tolling of the ORCP 17 safe-harbor). Plaintiff will

document all responses and attempts to confer and will file proof of post-filing conferral efforts with the Court.

4. If counsel had been available and the Exhibit known earlier, Plaintiff would have conferred pre-filing; given the time-sensitive preservation issues and the fact that this documentary evidence was newly discovered, Plaintiff properly files now and follows this post-filing conferral protocol to satisfy UTCR 5.010.

Date: January 16th, 2026

/s/ Adam Kobs

Adam E. Kobs, Pro Se
Residential address is confidential
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Email: adamkobs1984@proton.me

CERTIFICATE OF SERVICE (UTCR 5.100)

I certify that on January 16th, 2026 I served true and correct copies of the following documents on counsel of record by the methods stated below:

- Motion for Leave to File Supplemental Declaration (ORCP 23)
- Supplemental Declaration of Adam E. Kobs (with Exhibit A — Anker/Eufy printout)
- Proposed Order
- UTCR 5.010 Certificate of Conferral

Methods of service:

1. Electronic filing: The documents were filed via the Oregon Odyssey File & Serve system and thereby electronically served to counsel of record.
2. Email: Immediately after filing, PDF copies were emailed to counsel of record at the following addresses: • Guy E. Keating — gkeating@schulte-law.com • Tyler C. Honn — thonn@schulte-law.com • Rochelle Murphy — rmurphy@schulte-law.com • Matthew Smith — msmith@schulte-law.com

I declare under penalty of perjury under the laws of the State of Oregon that the foregoing is true and correct.

Date: January 16th, 2026

/s/ Adam Kobs

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